

EXHIBIT “B”

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

_____X

IN RE: AIR CARGO SHIPPING SERVICES :
ANTITRUST LITIGATION :

: MDL No. 1775

THIS DOCUMENT RELATES TO: :
ALL ACTIONS :

: Master File 06-MD-1775 (JG)(VVP)

:

:

:

_____X

THIRD STIPULATED [PROPOSED]

SCHEDULING ORDER

June 5, 2012	First date by which Defendants make their class certification experts available for deposition—deposition dates to be agreed upon by the parties.
October 5, 2012	Plaintiffs file their reply brief in support of class certification and make expert disclosures, if any, with underlying expert materials. ¹
October 8, 2012	First phase of fact depositions resumes. (Plaintiffs may take up to 7 depositions not previously noticed or subject to a pending letter of request.) No party may rely upon or cite any of the testimony in connection with the motion for class certification or any further papers with respect thereto.
October 16, 2012	First date by which Plaintiffs make their class certification reply experts, if any, available for deposition—deposition dates to be agreed upon by the parties.
November 20, 2012	Parties file Daubert motions, if any. If Defendants seek leave of court to file one or more Surreplies and/or further expert reports with respect to class certification and if the Court grants that request, such Surreplies and/or further expert reports to be filed by this date.
December 2012	If no Daubert motions or Surreplies and/or further expert reports are filed, the Court shall hold an evidentiary hearing (2 days) with respect to Plaintiffs' motion for class certification. Witnesses shall be limited to experts who have submitted reports.
January 1, 2013	If no Daubert motions or Surreplies and/or further expert reports are filed, the second phase of fact depositions begins.

¹ All parties will serve all backup data and other backup materials from their experts on the dates designated in this Scheduling Order for expert reports, or as soon thereafter as possible. The parties acknowledge that the dates in this stipulation for expert reports are premised upon the prompt production of such materials by all parties and their experts.

January 2013	On a mutually convenient date, the parties will meet and confer to determine the number of depositions to be allowed in the second phase of fact depositions.
January 18, 2013	Parties may file any oppositions to Daubert motions.
February 22, 2013	Parties may file replies in support of Daubert motions.
March 25, 2013 or later	If Daubert motions or Surreplies and/or further expert reports are filed the Court shall hold an evidentiary hearing (2 days) with respect to Plaintiffs' motion for class certification and any Daubert motions. Witnesses shall be limited to experts who have submitted reports.
April 1, 2013	If Daubert motions or Surreplies and/or further expert reports are filed, the second phase of fact depositions begins.
December 31, 2013	End of fact discovery. (September 30, 2013, if no Daubert motions or Surreplies and/or further expert reports are filed.)
February 28, 2014	Date by which the parties shall serve expert reports in support of matters on which they bear the burden of proof. (November 25, 2013, if no Daubert motions or Surreplies and/or further expert reports are filed.)
March 10, 2014	First date by which parties make their merits experts available for deposition—deposition dates to be agreed upon by the parties. (December 5, 2013, if no Daubert motions or Surreplies and/or further expert reports are filed.)
April 30, 2014	Date by which the parties shall serve answering expert reports. (February 28, 2014, if no Daubert motions or Surreplies and/or further expert reports are filed).

May 12, 2014	First date by which parties make their answering experts available for deposition—deposition dates to be agreed upon by the parties. (March 10, 2014, if no Daubert motions or Surreplies and/or further expert reports are filed.)
June 16, 2014	Date by which the parties shall serve rebuttal expert reports. (April 15, 2014, if no Daubert motions or Surreplies and/or further expert reports are filed.)
June 26, 2014	First date by which parties make their rebuttal experts available for deposition—deposition dates to be agreed upon by the parties. (April 21, 2014, if no Daubert motions or Surreplies and/or further expert reports are filed.)
60 days after close of expert discovery ²	Last date by which parties may file motions for summary judgment. Responses shall be filed 60 days after service of summary judgment motion and reply briefs shall be filed 45 days thereafter.
Plaintiffs' Proposal: 60 days after briefing on summary judgment motion	The Parties file joint pre-trial order and pre trial filings described in paragraphs 4A and 4B of Judge John Gleeson's Motion and Individual Practices Order.
Defendants' proposal: 60 days after decision on summary judgment motion	The Parties file joint pre-trial order in compliance with paragraph 4A of Judge John Gleeson's Motion and Individual Practices Order; the Parties will file Rule 4B filings according to the time frame set forth in paragraph 4B of Judge John Gleeson's Motion and Individual Practices Order.

² Expert discovery shall be deemed closed upon the later of the completion of the final expert deposition or resolution of any motions to compel or other expert-discovery-related disputes.

Dated: June __, 2012

Respectfully submitted,

/s/ George N. Tompkins, Jr.

George N. Tompkins, Jr.
WILSON ELSEER MOSKOWITZ
EDELMAN & DICKER LLP
150 East 42nd Street
212 490 3000 (telephone)
212 490 3038 (facsimile)

*Counsel for Air China Limited and Air China
Cargo Company Limited*

/s/ Michael J. Holland

Michael J. Holland
CONDON & FORSYTH LLP
7 Times Square, 18th Floor
New York, NY 10036
212 490 9100 (telephone)
212 370 4453 (facsimile)

Counsel for Air New Zealand Limited

/s/ David H. Bamberger

David H. Bamberger
Deana L. Cairo
DLA PIPER LLP (US)
500 Eighth Street, N.W.
Washington, D.C. 20004
(202) 799-4000 (telephone)
(202) 799-5000 (facsimile)

Counsel for Cathay Pacific Airways Ltd.

/s/ E. Christopher Murray

E. Christopher Murray
Thomas A. Telesca
RUSKIN MOSCOU FALTISCHEK
1425 RXR Plaza
15th Floor, East Tower
Uniondale, NY 11556
(516) 663-6600 (telephone)

Counsel for Air India

/s/ Ian Simmons

Ian Simmons
O'MELVENY & MYERS LLP
1625 Eye Street, N.W.
Washington, D.C. 20006-4001
(202) 383-5106 (telephone)
(202) 383-5414 (facsimile)

Counsel for Asiana Airlines Inc.

/s/ James V. Dick

James V. Dick
SQUIRE SANDERS (US) LLP
1200 19th Street, NW, Suite 300
Washington, D.C. 20036
(202) 626-6600 (telephone)
(202) 626-6780 (facsimile)

Counsel for China Airlines, Ltd.

/s/ Christopher T. Casmassima

Christopher T. Casamassima
KIRKLAND & ELLIS LLP
333 South Hope Street
Los Angeles, CA 90071
(213) 680-8374 (telephone)
(213) 680-8500 (facsimile)

James H. Mutchnik, P.C.
KIRKLAND & ELLIS LLP
300 North LaSalle Street
Chicago, IL 60654
(312) 862-2000 (telephone)
(312) 862-2200 (facsimile)

Counsel for EVA Airways Corporation

/s/ William R. Sherman

MARGARET M. ZWISLER
WILLIAM R. SHERMAN
Latham & Watkins LLP
555 Eleventh Street NW, Suite 1000
Washington, DC 20004
(202) 637-2200 (telephone)

*Attorneys for Singapore Airlines Cargo PTE LTD
and Singapore Airlines Limited*

/s/ John R. Fornaciari

John R. Fornaciari
Robert M. Disch
BAKER & HOSTETLER LLP
Washington Square
1050 Connecticut Avenue NW
Suite 1100
Washington DC 20036
(202) 861 – 1500 (telephone)
(202) 861 – 1783 (facsimile)

Counsel for Nippon Cargo Airlines Co., Ltd.

/s/ Barry G. Sher

Barry G. Sher
Kevin C. Logue
PAUL, HASTINGS, JANOFSKY
& WALKER LLP
75 East 55th Street, First Floor
New York, NY 10022
(212) 318-6000 (telephone)
(212) 319-4090 (facsimile)

Counsel for Korean Air Lines Co., Ltd.

/s/ Harvey J. Wolkoff

Harvey J. Wolkoff
Ropes & Gray LLP
Prudential Tower
800 Boylston Street
Boston, Massachusetts 02199
(617) 951-7000 (telephone)

*Counsel for Atlas Air Worldwide Holdings, Inc.,
Polar Air Cargo, LLC, and Polar Air Cargo
Worldwide, Inc.*

/s/ Michael D. Hausfeld

Michael D. Hausfeld
William P. Butterfield
Brent W. Landau
HAUSFELD LLP
1700 K Street, Suite 650
Washington, DC 20006
(202) 540-7200 (telephone)

Counsel for Plaintiffs

/s/ Hollis L. Salzman

Hollis L. Salzman
Jay L. Himes
Gregory S. Asciolla
LABATON SUCHAROW LLP
140 Broadway
New York, NY 10005
(212) 907-0700 (telephone)

Counsel for Plaintiffs

/s/ Robert N. Kaplan

Robert N. Kaplan
Gregory K. Arenson
Gary L. Specks
KAPLAN FOX & KILSHEIMER, LLP
850 Third Avenue, 14th floor
New York, NY 10022
(212) 687-1980 (telephone)

Counsel for Plaintiffs

/s/ Howard J. Sedran

Howard J. Sedran
Austin B. Cohen
LEVIN, FISHBEIN, SEDRAN & BERMAN
510 Walnut Street
Philadelphia, PA 19106
(215) 592-1500 (telephone)

Counsel for Plaintiffs

Dated: _____

So Ordered

Viktor V. Pohorelsky
United States Magistrate Judge